

**IN THE UNITED STATES DISTRICT COURT FOR THE
MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

JOHNNY M. HUNT,

Plaintiff,

v.

SOUTHERN BAPTIST CONVENTION;
GUIDEPOST SOLUTIONS LLC; and
EXECUTIVE COMMITTEE OF THE
SOUTHERN BAPTIST CONVENTION

Defendants.

Case No. 3:23-cv-00243

Judge Campbell
Magistrate Judge Frensley

JURY DEMAND

**NON-PARTY JANE DOE’S MOTION TO EXPEDITE
AND FOR EMERGENCY RELIEF**

Jane Doe, a non-party in the above civil action and sexual abuse survivor appearing under the pseudonym “Jane Doe” (pursuant to a contemporaneously filed Motion to Proceed Pseudonymously and to Redact References to Her Name and Identifying Information in Public Filings (“Motion to Proceed Pseudonymously”)), respectfully submits this Motion for Expedited Ruling on her: Motion to Proceed Pseudonymously, Motion for Leave to File Under Seal, and Motion for Protective Order.

In support, Jane Doe states:

1. Jane Doe filed her Motion to Proceed Pseudonymously on April 9, 2024.
2. Jane Doe’s Motion to Proceed Pseudonymously asks this Court to allow her to proceed under a pseudonym and to require redaction of her identifying information in public filings so that she can proceed in attempts to protect herself from annoyance, embarrassment, oppression, and undue burden and expense, by being unwillingly and publicly drawn into a case related to her sexual assault by Plaintiff.

3. Jane Doe's Motion to Proceed Pseudonymously (and its associated Motion for Leave to file Under Seal) was necessary in order for Jane Doe to file a Motion for Protective Order related to her deposition noticed for April 16, 2024, also filed contemporaneously herewith.
4. Jane Doe has tangible and immediate concerns about Plaintiff's seemingly willful efforts to reveal her identity publicly in this case in an effort to gain strategic advantage and/or subject her to annoyance, embarrassment, oppression, and undue burden and expense, as illustrated in the Declaration of Melissa J. Hogan (redacted), filed contemporaneously herewith, specifically paragraphs 10, 11, 20, and 25-28 of such declaration.
5. Under Middle District of Tennessee Local Rules, responses to Jane Doe's motions would be due fourteen (14) days after service of the motions. Local Rule 7.01(3).
6. Under the standard briefing schedule, response(s) would be due April 23, 2024, which would allow significant time for Jane Doe's identity to be at risk and would be after the deposition noticed for April 16, 2024, which is the subject of Jane Doe's Motion for Protective Order.
7. Therefore, expedited relief is required to protect Jane Doe from annoyance, embarrassment, oppression, or undue burden or expense, to prevent prejudice to Jane Doe, and to keep discovery moving forward without delay.

Pursuant to Local Rule 37.01(a), counsel for Jane Doe has conferred with counsel for each of the Defendants who do not oppose this motion. We attempted to confer with counsel for the Plaintiff about this motion, but Plaintiff refused to communicate a position on this motion without demanding that we rehash other matters that we've already conferred about and which are a part of the other motions mentioned herein. Given the very nature of our request to expedite and the

reasons therefore, Jane Doe has proceeded.

For the foregoing reasons, Jane Doe hereby respectfully requests that the Court grant this motion.

Dated: April 9, 2024

Respectfully submitted,

s/ Melissa J. Hogan

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CERTIFICATE OF SERVICE

The undersigned certifies that on **April 9, 2024**, I electronically filed a true and correct copy of the foregoing with the Clerk of Court for the U.S. District Court Middle District of Tennessee through the Court's Electronic Case Filing System, which will automatically serve all counsel of record listed below:

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By: s/ Melissa J. Hogan